

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

Sheila Anderson,

Plaintiff,

vs.

The Boeing Company,

Defendant.

C/A No.: 2:17-cv-00891-RMG-MGB

**DEFENDANT'S NOTICE OF
REMOVAL**

TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA, CHARLESTON DIVISION; THE CIRCUIT COURT FOR CHARLESTON COUNTY, SOUTH CAROLINA; AND ALL PARTIES AND ATTORNEYS OF RECORD:

1. Please take notice that Defendant The Boeing Company ("Boeing"), pursuant to 28 U.S.C. §§ 1331, 1332, 1441 and 1446, hereby removes the above-entitled action from the Court of Common Pleas for Charleston County, State of South Carolina, to the United States District Court for the District of South Carolina, Charleston Division.

2. This action was instituted by Plaintiff against Defendant by service of the Summons and Complaint upon its registered agent for the Boeing Company, via U.S. certified-mail on March 7, 2017. This action is pending in the Court of Common Pleas of Charleston County, State of South Carolina, under Case Number 2017-CP-10-0925.

3. The Notice of Removal is filed within thirty (30) days of service pursuant to 28 U.S.C. § 1446(b)(1). A copy of the attached Summons and Complaint constitute all process and pleadings served in this action (Exhibit A).

7. Defendant submits this Notice of Removal without waiving any defenses to the claims asserted by Plaintiff or conceding that Plaintiff has pled claims upon which relief can be granted.

8. Defendant will timely provide a copy of the Notice of Removal to the Clerk of Court for Charleston County.

9. By copy of this Notice of Removal, and in accordance with the attached Certificate of Service, Defendant is providing notice to Plaintiff in this action and advising Plaintiff of this filing pursuant to 28 U.S.C. § 1446(d).

10. Defendant has simultaneously served herewith its Rule 7.1 Corporate Disclosure Statement, responses to Local Rule 26.01 Interrogatories, and will timely file its response to the Complaint.

11. In the event any question arises as to the propriety of removal of this action, Defendant reserves the right to amend or supplement this Notice of Removal, and further requests the opportunity to present briefs, oral arguments and, if necessary, affidavits and other evidence in support of its position that removal is proper.

WHEREFORE, pursuant to 28 U.S.C. §§ 1331, 1332, 1441 and 1446, Defendant hereby removes this matter from the Court of Common Pleas for Charleston County, South Carolina, into this Court for trial and determination.

s/Molly Hughes Cherry

Molly Hughes Cherry (Federal ID No. 7067)

Melissa A. Fried (Federal ID No. 11194)

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ATTORNEYS FOR DEFENDANT
THE BOEING COMPANY

April 5, 2017
Charleston, South Carolina

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing DEFENDANT'S NOTICE OF REMOVAL has been served upon the following counsel of record by placing the same in the United States mail, first class postage prepaid, addressed to the following as shown below this 5th day of April, 2017 to the following:

Bonnie Travaglio Hunt
Hunt Law LLC
P.O. Box 1845
Goose Creek, SC 29445

ATTORNEYS FOR PLAINTIFF

s/Molly Hughes Cherry
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